



Specialists in Roofing
and Waterproofing

Anti-Bribery Policy

Anti-Bribery

Bribery is a serious criminal offence and corrupt acts expose the Employer and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation.

Radmat Building Products Limited is committed to the prohibition of such conduct. This is not just a cultural and moral commitment on the part of the organisation; it is a legal requirement.

The Company has a strict anti-bribery and corruption policy in line with the Bribery Act 2010.

A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If any employee bribes (or attempts to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct.

Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances, you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- Accepting any financial or other reward from any person i.e. customer, supplier, third party, in return for providing some favour e.g. a weekend away if you agree to put business their way
- Requesting a financial or other reward from any person in return for providing some favour
- Offering any financial or other reward from any person in return for providing some favour.
- Failure to prevent a bribe being paid on the organisation's behalf.

Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. Gifts should only be accepted if they are no made with the intention of influencing a business decision. All gifts, however small, should be referred to the Finance Department for them to decide whether it is appropriate that the gift is accepted. If the gift is accepted it will be included in the Christmas raffle where appropriate.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the Directors. Permission must be given by the Directors before an employee accepts any invitation.

Offering gifts and hospitality

It is Radmat's custom to offer small gifts to customers and suppliers. If a gift is authorised by the head of department the employee is entitled to give it to the appropriate individuals.

Radmat occasionally runs hospitality events, primarily aimed at thanking customers. All hospitality events must be authorised by the Directors.

Responsibilities of the head of department

Heads of department are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in their department.

If heads of department are concerned about any actions, they should contact a Director immediately for advice.

Heads of department are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Heads of department must authorise all expense claims from their employees. Heads of department are expected to check and sign all expense claims from their employees against receipts.

Any items of expenditure that give rise to concern should be fully investigated.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed or has been asked to accept or offer a bribe should report this matter to his or her head of department immediately or if this is not appropriate, to Robert Speroni.

Donations to organisations

The organisation makes annual donations to chosen charities as managed by the Charity Committee. No additional donations to a charity should be made without the approval of the Directors.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary action

Any employee found to have offered, requested, accepted or failed to prevent a bribe will face disciplinary action, which could include dismissal for gross misconduct.

Raising concerns

If an employee is concerned that acts of bribery are occurring in the organisation they should inform their head of department in the first instance. If this course of action is inappropriate, the employee should inform a Director. No employee will suffer any less favourable treatment for raising a concern under the policy, provided that it is raised in good faith.

A handwritten signature in black ink, appearing to read "R Speroni", with a small dot to the right of the signature.

Robert Speroni
Managing Director
Reviewed: August 2018